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November 11, 2011

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

Re: United States v. Thomas Gioeli, *et al.*
Case No. 08-cr-240 (S6) (BMC) (RER)

Dear Judge Cogan:

I am counsel, along with Carl J. Herman, Esq., for defendant Thomas Gioeli in connection with the above matter. I am writing in response to your two orders, dated November 9, 2011. *See* ECF No. 1298.

I would like the Court accept this letter as a bail application on behalf of Mr. Gioeli based upon and for the limited purpose outlined in the letters submitted by Mr. Gioeli and his family. We understand that this request will result in the unsealing in un-redacted form of those letters.

Please do not hesitate to contact me if you have any questions or need any additional information in connection with the foregoing.

Respectfully submitted,



Adam D. Perlmutter

The Honorable Brian M. Cogan

November 11, 2011

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Cc: Thomas Gioeli (via regular mail)
All counsel (via ECF)